

AGENDA BILL APPROVAL FORM

Agenda Subject: Resolution No. 4453		Date: February 12, 2009
Department: Public Works	Attachments: Resolution No. 4453	Budget Impact: \$ 0
Administrative Recommendation: City Council adopt Resolution No. 4453.		
Background Summary: Resolution No. 4453 approves the updated Stormwater Management Program for implementation in the City of Auburn and the Mayor is authorized to include a copy of this program in the National Pollutant Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit annual report for 2008 to the Washington State Department of Ecology.		
W0316-5 O3.4.1.10, O4.8		
Reviewed by Council & Committees: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Arts Commission <input type="checkbox"/> Airport <input type="checkbox"/> Hearing Examiner <input type="checkbox"/> Human Services <input type="checkbox"/> Park Board <input checked="" type="checkbox"/> Planning Comm. </div> <div> COUNCIL COMMITTEES: <input type="checkbox"/> Finance <input type="checkbox"/> Municipal Serv. <input type="checkbox"/> Planning & CD <input checked="" type="checkbox"/> Public Works <input type="checkbox"/> Other _____ </div> </div>		Reviewed by Departments & Divisions: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Building <input type="checkbox"/> Cemetery <input type="checkbox"/> Finance <input type="checkbox"/> Fire <input type="checkbox"/> Legal <input checked="" type="checkbox"/> Public Works </div> <div> <input type="checkbox"/> M&O <input type="checkbox"/> Mayor <input type="checkbox"/> Parks <input type="checkbox"/> Planning <input type="checkbox"/> Police <input type="checkbox"/> Human Resources </div> </div>
Action: Committee Approval: <input type="checkbox"/> Yes <input type="checkbox"/> No Council Approval: <input type="checkbox"/> Yes <input type="checkbox"/> No Referred to _____ Until ____/____/____ Tabled _____ Until ____/____/____ <div style="text-align: right;">Call for Public Hearing ____/____/____</div>		
Councilmember: Wagner		Staff: Dowdy
Meeting Date: March 16, 2009		Item Number: VIII.B.1

RESOLUTION NO. 4453

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF AUBURN, WASHINGTON, APPROVING THE 2009 STORMWATER MANAGEMENT PROGRAM AND AUTHORIZING THE MAYOR TO INCLUDE A COPY OF THE PROGRAM IN THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM WESTERN WASHINGTON PHASE II MUNICIPAL STORMWATER PERMIT ANNUAL REPORT FOR 2008 TO THE WASHINGTON STATE DEPARTMENT OF ECOLOGY

WHEREAS, The Washington State Department of Ecology issued a National Pollutant Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit that regulates the discharge of stormwater from municipal stormwater systems; and

WHEREAS, the City operates a municipal stormwater system and is regulated under the National Pollutant Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit; and

WHEREAS, the National Pollutant Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit requires development and implementation of a Stormwater Management Program; and

WHEREAS, the Stormwater Management Program is required to be updated annually;

WHEREAS, the National Pollutant Discharge Elimination System Western Washington Phase II Municipal Stormwater Permit requires submittal of an Annual Report which is to include a copy of the updated Stormwater Management Program.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF AUBURN,
WASHINGTON, HEREBY RESOLVES as follows:

Section 1. That the updated Stormwater Management Program is approved for implementation in the City of Auburn in substantial conformity with the copy of the Program attached hereto, marked as Exhibit "A" and incorporated herein by this reference.

Section 2. That the Mayor is hereby authorized to implement such administrative procedures as may be necessary to carry out the directives of this legislation, including submitting a copy of the Program with the City's Annual Report to the Department of Ecology.

Section 3. That this Resolution shall take effect and be in full force upon passage and signatures hereon.

Dated and Signed this _____ day of _____, 2009.

CITY OF AUBURN

PETER B. LEWIS
MAYOR

ATTEST:

Danielle E. Daskam,
City Clerk

APPROVED AS TO FORM:



Daniel B. Heid,
City Attorney

CITY OF AUBURN
2009 STORMWATER MANAGEMENT
PROGRAM

City of Auburn, WA
March 2009

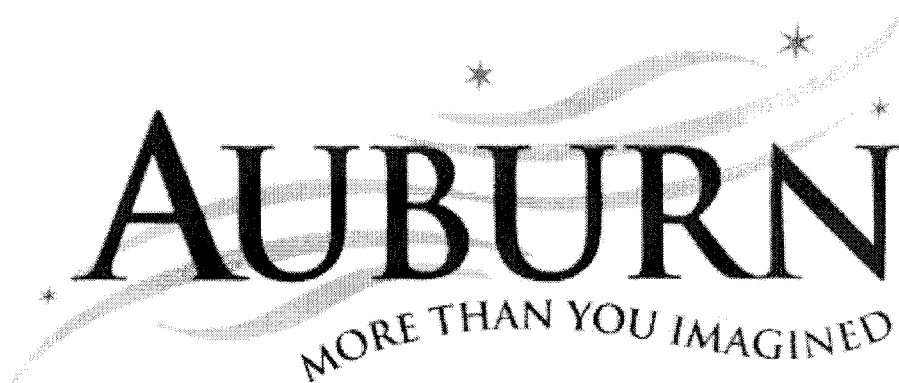


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CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

1. INTRODUCTION

1.1 Overview

This document presents the City of Auburn's Stormwater Management Program (SWMP). Preparation and maintenance of this SWMP is required by the Washington State Department of Ecology (Ecology) as a condition of the Western Washington Phase II Municipal Stormwater Permit (the Phase II Permit). The Phase II permit covers discharges from regulated small municipal separate storm sewer systems (MS4s). Based on criteria outlined in the Phase II Permit, Ecology considers the City of Auburn to be an operator of a small MS4, and therefore required to obtain permit coverage.

Each municipality's permit for discharging stormwater is designed to reduce the discharge of pollutants, protect water quality, and meet the requirements of the federal Clean Water Act.

Appendix A includes acronyms and definitions from the Permit to help the reader understand the City's Stormwater Management Program.

1.2 Regulatory Background

The National Pollutant Discharge Elimination System (NPDES) permit program is a requirement of the federal Clean Water Act, which is intended to protect and restore waters for "fishable, swimmable" uses. The federal Environmental Protection Agency (EPA) has delegated permit authority to state environmental agencies, and these agencies can set permit conditions in accordance with and in addition to the minimum federal requirements. In Washington, the NPDES-delegated permit authority is the Washington State Department of Ecology (Ecology).

Municipalities with a population of over 100,000 (as of the 1990 census) have been designated as Phase I communities and must comply with Ecology's Phase I NPDES Municipal Stormwater Permit. With Auburn's 1990 census falling below the 100,000 threshold, the City must comply with the Phase II Municipal Stormwater Permit. About 100 other municipalities in Washington must now comply with the Phase II Permit, along with Auburn, as operators of small municipal separate storm sewer systems (MS4s). Ecology's Phase II Municipal Stormwater Permit is available on Ecology's website at <http://www.ecy.wa.gov/programs/wq/stormwater/municipal/phaseIIww/wwphiipermit.html>

The Permit allows municipalities to discharge stormwater runoff from municipal drainage systems into the state's water bodies (e.g., streams, rivers, lakes, wetlands) as long as municipalities implement programs to protect water quality by reducing the discharge of "non-point source" pollutants to the "maximum extent practicable" (MEP) through application of Permit-specified "best management practices" (BMPs). The BMPs specified in the Permit are collectively referred to as the Stormwater Management Program (SWMP) and grouped under the following Program components:

- Public Education and Outreach
- Public Involvement
- Illicit Discharge Detection and Elimination

- Controlling Runoff from Development, Redevelopment, and Construction Sites
- Pollution Prevention and Municipal Operation and Maintenance
- Monitoring

The Permit issued by Ecology became effective on February 16, 2007 and expires on February 15, 2012. The Permit requires the City to report annually (March 31st of each year) on progress in SWMP implementation for the previous year. The Permit also requires submittal of documentation that describes proposed SWMP activities for the coming year. This document contains the City's proposed activities for 2009.

Implementation of various Permit conditions is staggered throughout the five-year Permit term from February 16, 2007 through February 15, 2012. The Permit will be revised and reissued at the end of this period.

1.3 City of Auburn Regulated Area

The Western Washington Phase II Permit applies to operators of regulated small MS4s that discharge stormwater to waters of Washington State located west of the crest of the Cascade Range (west of the eastern boundaries of Whatcom, Skagit, Snohomish, King, Pierce, Lewis and Skamania counties). For cities, the Permit requirements extend to those areas of each City that drain to MS4s. Most of Auburn drains to MS4s that ultimately discharge into the Green River, the White River, or Mill Creek. In addition, some portions of the City drain to regional infiltration basins.

1.4 Total Maximum Daily Load (TMDL) Compliance

The federal Clean Water Act requires that Ecology establish "Total Maximum Daily Loads" (TMDL) for rivers, streams, lakes, and marine waters that don't meet water quality standards. A TMDL is a calculation of the maximum amount of a pollutant that a water body can receive and still meet water quality standards. After the TMDL has been calculated for a given water body, Ecology determines how much each source must reduce its discharges of the pollutant in order bring the water body back into compliance with the water quality standards. The Clean Water Act requires that TMDL requirements must be included in the NPDES permits for dischargers into the affected water bodies.

Stormwater discharges covered under this permit are required to implement actions necessary to achieve the pollutant reductions called for in applicable TMDLs. Applicable TMDLs are those approved by the EPA before the issuance date of the Permit or which have been approved by the EPA prior to the date the permittee's application was received by Ecology. Information on Ecology's TMDL program is available on Ecology's website at www.ecy.wa.gov/programs/wq/tmdl.

The current permit does not contain any TMDL requirements for the City of Auburn. However, Ecology has identified several water bodies that do not appear to meet the water quality standards. If Ecology establishes TMDLs for one or more of these water bodies prior to 2012, the next version of the Permit may contain additional requirements specified in the TMDL.

1.5 SWMP Implementation Responsibilities

The Utilities Engineering Division in the Public Works Department coordinates the overall administration of efforts to comply with Permit requirements. The work plan tables in each Chapter provide the lead departments for the associated task. Other major departments/divisions included in the 2009 SWMP implementation include Maintenance and Operations (M&O), Communications and Multimedia, Human Resources (HR), Development Engineering, Permit Center, Information services (IS), and Parks.

1.6 Document Organization

The contents of this document are based upon Permit requirements and Ecology's "Draft Guidance for City and County Annual Reports for Western Washington, Phase II Municipal Stormwater Permits." The remainder of this SWMP is organized similarly to the Permit:

- **Section 2.0** addresses Permit requirements for administering the City's Stormwater Management Program for 2009.
- **Section 3.0** addresses Permit requirements for public education and outreach for 2009.
- **Section 4.0** addresses Permit requirements for public involvement and participation for 2009.
- **Section 5.0** addresses Permit requirements for illicit discharge detection and elimination for 2009.
- **Section 6.0** addresses Permit requirements for controlling runoff from new development, redevelopment, and construction sites for 2009.
- **Section 7.0** addresses Permit requirements for pollution prevention and operations and maintenance for municipal operations for 2009.
- **Section 8.0** addresses Permit requirements for the monitoring section of the Permit for 2009.

Each section includes a summary of the relevant Permit requirements, a description of current activities, and a table showing the planned activities for 2009. This document also includes acronyms and definitions from the Permit in Appendix A for easy reference.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

2. STORMWATER MANAGEMENT PROGRAM ADMINISTRATION

This section of the SWMP describes Permit requirements related to overall Stormwater Management Program administration, including descriptions of the City's current and planned compliance activities for 2009.

2.1 Permit Requirements

The Permit (Section S5.A) requires the City to:

- Develop and implement a Stormwater Management Program and prepare written documentation for submittal to Ecology on March 31, 2008, and update the SWMP annually thereafter. The purpose of the SWMP is to reduce the discharge of pollutants from the municipal stormwater system to the maximum extent practicable and thereby protect water quality.
- Submit annual compliance reports (for the previous calendar year) to Ecology on March 31, beginning in 2008 that summarize the status of implementation and provide information from assessment and evaluation procedures collected during the reporting period.
- Coordinate with other permittees on stormwater related policies programs, and projects within adjacent or shared areas.

2.2 Current Compliance Activities

The City has activities and programs that meet many of the Permit requirements. The current compliance activities associated with the Permit include:

- The City is on track to comply with Ecology requirements for submittal of SWMP documentation by March 31, 2009. The Utilities Engineering Division is currently leading the development of the future planned activities with input and support from several other departments.
- The City created an NPDES implementation management group.
- The City set up the systems for tracking training.
- The City has defined its strategy for cost tracking.
- The City is participating in a regional education and outreach consortium.
- The City is on track to comply with Ecology's requirements for submittal of the second Annual Compliance Report by March 31, 2009.

2.3 Planned 2009 Compliance Activities

Auburn has positioned itself well to maintain compliance as Ecology phases in the future Permit deadlines. Table 2-1 presents the proposed work plan for the 2009 SWMP administration activities.

Table 2-1. 2009 Stormwater Management Administration Program Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
SWMP-1	Define NPDES training modules and staff attendance requirements.	HR	First training to be completed by 8/19/2009.
SWMP-2	Define and implement strategy/system for managing standard practices and procedures that are used among multiple departments.	Utilities Engineering	SOPs and responsibilities should be established during the Permit term.
SWMP-3	Refine and implement NPDES cost accounting strategy for time spent on each component of Permit.	Finance	New cost tracking procedures must be in place by 1/01/2009.
SWMP-4	Summarize annual activities for "Stormwater Management Program" component of Annual Report; identify any updates to Program document. Define process and roles for annual updates for SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

3. PUBLIC EDUCATION AND OUTREACH

This section describes the Permit requirements related to public education and outreach, including descriptions of the City's current and planned compliance activities for 2009.

3.1 Permit Requirements

The Permit (Section S5.C.1) requires the City to:

- Prioritize and target education and outreach activities to specified audiences, including the general public, businesses, residents/homeowners, landscapers, property managers, engineers, contractors, developers, review staff and land use planners, and other City employees to reduce or eliminate behaviors and practices that cause or contribute to adverse stormwater impacts.
- Have an outreach program that is designed to improve the target audience's understanding of the problem and what they can do to solve it.
- Track and maintain records of public education and outreach activities.

3.2 Current Compliance Activities

The City has activities and programs that meet many of the Permit requirements. The current compliance activities associated with the Permit include:

- Collaboration with other NPDES municipalities through involvement in the Stormwater Outreach for Regional Municipalities (STORM) integrated public education campaign.
- Many of the current education and outreach activities that address stormwater management are targeted at the general public, residents/homeowners, and some industries. Some of these programs are listed below:
 - Natural yard care workshops
 - Car wash kits
 - Storm drain stenciling
 - Powerful Choices for the Environment
 - Used motor oil and household hazardous waste program
 - Residential hazardous waste newsletter
 - Kids day
 - Water Festival
 - Green Schools program (district-wide)
 - Household hazardous waste mobile
 - Spring Clean-up (curbside appliance pickup)

- News letter (quarterly or biannually) for business
- The City conducts an annual phone survey that could be used to develop a stormwater quality “awareness baseline” from which to measure future improvements.
- The City tracks its education and outreach efforts.

3.3 Planned 2009 Compliance Activities

While the City has an existing stormwater public education and outreach program that meets most of the Permit requirements, some additional elements will be required. The Permit requires prioritization of specific target audiences and subject areas. The target audiences are to include:

- The general public
- Businesses (including home-based and mobile businesses)
- Residents/homeowners
- Landscapers
- Property managers
- Engineers, contractors, and developers
- City plan review staff, land use planners, and other City employees.

To comply with the Permit, the City will review all existing programs and determine if they can be modified to address all the target audiences and/or add additional programs to comply with Permit requirements. Auburn may be able to take advantage of regional efforts intended to meet NPDES permit requirements, thereby reducing City efforts and costs.

Table 3-1 presents the work plan for the 2009 SWMP public education and outreach activities.

Table 3-1. 2009 Public Education and Outreach Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
EDUC-1	Continue collaboration with other NPDES municipalities to identify appropriate program evaluation techniques.	Communications and Multimedia	Refinements to existing public education and outreach activities to be in place by 02/16/2009.
EDUC-2	Refine education and outreach strategy to supplement existing education activities.	Communications and Multimedia	
EDUC-3	Implement new or modify existing education and outreach activities.	Communications and Multimedia	
EDUC-4	Develop strategy and process to evaluate understanding and adoption of target behaviors.	Communications and Multimedia	
EDUC-5	Summarize annual activities for "Public Education and Outreach" component of Annual Report; identify any updates to SWMP.	Communications and Multimedia	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

4. PUBLIC INVOLVEMENT

This section describes the Permit requirements related to public involvement, including descriptions of the City's current and planned compliance activities for 2009.

4.1 Permit Requirements

The Permit (Section S5.C.2) requires the City to:

- Provide ongoing opportunities for public involvement through advisory boards or commissions and watershed committees, and public participation in developing rate structures and budgets, stewardship programs, environmental actions, or other similar activities. The public must be able to participate in the decision-making processes, including development, implementation, and update of the SWMP.
- Make the SWMP and Annual Compliance Report available to the public, by posting on the City's website. Make any other documents required to be submitted to Ecology in response to Permit conditions available to the public.

4.2 Current Compliance Activities

The City has activities and programs relevant to the public involvement requirement. These activities are summarized below.

- The City has defined a series of public involvement activities intended to meet the Permit requirements for public involvement in development of the first Stormwater Management Program. This process involves presenting the draft SWMP to the Planning and Community Development (PCDC) and Public Works (PWC) Committees. The City will then have a public hearing and presentation to the City Council.
- The City will make the Stormwater Management Program document and Annual Compliance Report available to the public on the City website.

4.3 Planned 2009 Compliance Activities

The City of Auburn has a history of including the public in decision making. Table 4-1 below presents the work plan for the 2009 SWMP public involvement activities.

Table 4-1. 2009 Public Involvement Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
PI-1	Provide public involvement opportunities for annual SWMP update.	Utilities Engineering	Public involvement opportunities will be available before 3/31/2009 submittal.
PI-2	Make SWMP document and Annual Compliance Report available to public by posting on the City website.	Utilities Engineering	
PI-3	Summarize annual activities for "Public Involvement and Participation" component of Annual Report; identify any updates to SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

5. ILLICIT DISCHARGE DETECTION AND ELIMINATION

This section describes the Permit requirements related to illicit discharge detection and elimination (IDDE), including descriptions of the City's current and planned compliance activities for 2009.

5.1 Permit Requirements

The Permit (Section S5.C.3) requires the City to:

- Implement an ongoing program to detect and remove illicit discharges, connections, and improper disposal, including any spills into the municipal separate storm sewers owned or operated by the City.
- Develop a storm sewer system map, have ordinances that prohibit illicit discharges, and create a program to detect and address illicit discharges.
- Publicly list and publicize a hotline or other local telephone number for public reporting of spills and other illicit discharges. Track illicit discharge reports and actions taken in response through close-out, including enforcement actions.
- Train staff on proper IDDE response SOPs and municipal field staff to recognize and report illicit discharges.
- Summarize all illicit discharges and connections reported to the City and response actions taken, including enforcement actions, in the Annual Compliance Report; identify any updates to the SWMP.

5.2 Current Compliance Activities

The City currently has activities and programs that meet many of the Permit requirements. The current compliance activities associated with the Permit include:

- The City has completed some of the mapping required for the Permit. The City also has an SOP for keeping the municipal separate storm sewer system map and inventory up-to-date.
- City codes and standards already have sections that address some of the required illicit discharges and civil infractions.
- Citizens can report illicit discharges or illicit dumping using any of the phone numbers published by the City. The calls are routed to Operations and Maintenance where they are recorded and distributed to the appropriate response authority.
- The City tracks spills, illicit discharges, and inspections.
- The City has chosen to use CarteGraph as its issue tracking and resolution system.
- The City created an IDDE response and enforcement SOP.

5.3 Planned 2009 Compliance Activities

The City will need to update current IDDE efforts in order to maintain compliance as the Permit requirements take effect. Table 5-1 presents the work plan for 2009 SWMP illicit discharge detection and elimination activities.

Table 5-1. 2009 Illicit Discharge Detection and Elimination Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
IDDE-1	Define and implement City-wide IDDE Program and develop any necessary supplemental IDDE activities.	Utilities Engineering	Program development to be completed by 8/19/2011.
IDDE-2	Continue to review and update storm system map to address data gaps and Permit requirements.	Utilities Engineering	Maps to be completed by 02/16/2011.
IDDE-3	Update IDDE codes as needed to address Permit requirements.	Utilities Engineering	Ordinance and code updates to be complete and adopted by 8/16/2009.
IDDE-4	Create a City-wide IDDE response and enforcement SOP.	Utilities Engineering	Enforcement strategy and implementation SOPs in place by 8/16/2009.
IDDE-5	Implement use of hotline for public reporting of spills and other illicit discharges. CarteGraph will be tied into hotline for issue tracking and resolution.	Utilities Engineering	Implement tracking system by 2/16/2009.
IDDE-6	Train municipal field staff on the identification, investigation, termination, cleanup, and reporting of illicit discharges, improper disposal and illicit connections.	Utilities Engineering, HR	Training program, including training tracking, must be developed by 8/16/2009.
IDDE-7	Incorporate awareness of illicit discharges into public outreach and education program.	Communications and Multimedia	Refinements to existing public education and outreach activities to be in place by 02/16/2009.
IDDE-8	Summarize annual activities for "Illicit Discharge Detection and Elimination" component of Annual Report; identify any updates to SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009
STORMWATER MANAGEMENT PROGRAM

6. CONTROLLING RUNOFF FROM NEW DEVELOPMENT, REDEVELOPMENT, AND CONSTRUCTION SITES

This section describes the Permit requirements related to controlling runoff from new development, redevelopment, and construction sites, including descriptions of the City's current and planned compliance activities for 2009.

6.1 Permit Requirements

The Permit (Section S5.C.4) requires the City to:

- Develop, implement, and enforce a program to reduce pollutants in stormwater runoff (i.e., illicit discharges) to the municipal separate storm sewer system from new development, redevelopment, and construction site activities. The program must apply to both private and public projects, including roads, and address all construction/development-associated pollutant sources.
- Adopt regulations (codes and standards) and implement plan review, inspection, and escalating enforcement SOPs necessary to implement the program in accordance with Permit conditions, including the minimum technical requirements in Appendix 1 of the Permit.
- Provide provisions and (plan review, inspection, and enforcement) SOPs to allow non-structural preventive actions and source reduction approaches such as Low Impact Development techniques, measures to minimize the creation of impervious surfaces, and measures to minimize the disturbance of native soils and vegetation.
- Adopt regulations (codes and standards) and provide provisions to verify adequate long-term operations and maintenance of new post-construction permanent stormwater facilities and BMPs in accordance with Permit conditions, including an annual inspection frequency and/or approved alternative inspection frequency and maintenance standards for private drainage systems as protective as those in Chapter IV of the 2005 Ecology Stormwater Management Manual for Western Washington.
- Provide copies of the Notice of Intent (NOI) for construction or industrial activities to representatives of the proposed new development and redevelopment.
- Provide training to staff on the new codes, standards, and SOPs and create public education and outreach materials.
- Develop and define a process to record and maintain all inspections and enforcement actions by staff.
- Summarize annual activities for the "Controlling Runoff" component of the Annual Compliance Report; identify any updates to the SWMP.

6.2 Current Compliance Activities

The City has activities and programs that meet many of the Permit requirements. The current compliance activities associated with the Permit include:

- The City has existing programs, codes, and standards that address many of the Permit requirements for management of stormwater runoff from development, redevelopment, and construction sites. The City already reviews all stormwater site plans for proposed development.
- The City has a site planning process for BMP selection and design criteria.
- The City inspects all permitted development sites during construction and after construction.
- The City clearly identifies the party responsible for operations and maintenance (O&M) and requires long-term O&M of permitted facilities and BMPs.
- The City tracks and records most inspections and enforcement actions by staff.
- The City provides copies of Notices of Intent (NOI) for construction and industrial activities in the pre-application meeting with developers.
- Construction inspectors and most building inspectors have the required erosion control training.

6.3 Planned 2009 Compliance Activities

The City has a program to help reduce stormwater runoff from new development and construction sites, but updates will be necessary to maintain compliance as the Permit requirements take effect. Table 6-1 presents the work plan for 2009 SWMP activities related to runoff control for new development, redevelopment, and construction sites.

Table 6-1. 2009 Controlling Runoff from Development, Redevelopment, and Construction Sites Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
CTRL-1	Select new Stormwater Manual and update necessary codes.	Utilities Engineering	Stormwater Manual adopted by 8/16/2009 including updates to codes and standards.
CTRL-2	Create SOP(s) defining the City's stormwater permitting, plan review, inspection, enforcement and record keeping processes.	Utilities Engineering	SOPs completed by 8/16/2009.
CTRL-3	Conduct staff training and public education and outreach on implementing new Stormwater Manual and new Permit requirements	Communications and Multimedia	Training completed by 8/16/2009.
CTRL-4	Train staff responsible for implementing the controlling runoff program from new development, redevelopment, and construction sites.	Utilities Engineering, Development Engineering Construction Inspection, Stormwater Inspection, Permit Center, HR	Training completed by 8/16/2009.
CTRL-5	Track and report construction, new development, and redevelopment permits, inspections, and enforcement actions.	Planning/ Permit Center	Tracking of inspections and enforcement actions by 8/16/2009.
CTRL-6	Summarize annual activities for "Controlling Runoff from New Development, Redevelopment, and Construction Sites" component of Annual Report; identify any updates to SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

7. POLLUTION PREVENTION AND OPERATION AND MAINTENANCE FOR MUNICIPAL OPERATIONS

This section describes the Permit requirements related to pollution prevention and operations and maintenance for municipal operations, including descriptions of the City's current and planned compliance activities for 2009.

7.1 Permit Requirements

The Permit (Section S5.C.5) requires the City to:

- Develop and implement an O&M program, with the ultimate goal of preventing or reducing pollutant runoff from municipal separate stormwater system and municipal O&M activities.
- Establish maintenance standards for the municipal separate stormwater system that are at least as protective as those specified in the 2005 Stormwater Management Manual for Western Washington.
- Perform required inspection frequency of stormwater flow control and treatment facilities and catch basins, unless previous inspection data show that a reduced frequency is justified.
- Have SOPs in place to reduce stormwater impacts associated with runoff from municipal O&M activities, including but not limited to streets, parking lots, roads, or highways owned or maintained by the City, and to reduce pollutants in discharges from all lands owned or maintained by the City.
- Train staff to implement the modified SOPs and document that training.
- Prepare Stormwater Pollution Prevention Plans (SWPPPs) for all heavy equipment maintenance or storage yards identified for year-round facilities or yards, and material storage facilities owned or operated by the City.
- Summarize annual activities for the "Pollution Prevention and Operations and Maintenance for Municipal Operations" component of the Annual Compliance Report; identify any updates to the SWMP.

7.2 Current Compliance Activities

The City has activities and programs that meet many of the Permit requirements. The current compliance activities associated with the above Permit requirements include:

- The City operates an O&M program intended to minimize pollutant runoff from municipal operations.
- The City conducts and records the necessary maintenance operations identified based on inspections of many stormwater control facilities. The City performs spot checks of potentially damaged permanent treatment and flow control facilities.
- M&O staff involved with pesticides, pest management, and erosion and sediment control, receive training in these areas.

- The City is working on a list of City-owned facilities that may need Stormwater Pollution Prevention Plans.

7.3 Planned 2009 Compliance Activities

Auburn performs many of the Permit required activities to limit stormwater pollution potential related to its municipal O&M program. However, updates will be necessary to maintain compliance as the Permit requirements take effect. No activities are required until 2010 but preparing for requirements due in early 2010 will be necessary. Table 7-1 presents the work plan for 2009 SWMP activities related to pollution prevention and operations and maintenance for municipal operations.

Table 7-1. 2009 Pollution Prevention and Operations and Maintenance Work Plan			
Task ID	Task Description	Responsible	Schedule Notes
PPOM-1	Set up processes to adopt new Stormwater Manual maintenance standards.	Utilities Engineering	Standards to be adopted by 02/15/2010.
PPOM-2	Refine data management systems to track maintenance activities and inspections.	Utilities Engineering	Tracking systems in place by 02/15/2010.
PPOM-3	Begin creating Stormwater Pollution Prevention Plans for affected City facilities.	Utilities Engineering	Begin creating SWPPPs in 2009, implementing SWPPP SOPs by 02/15/2010.
PPOM-4	Develop and establish policies and procedures to reduce pollutants in stormwater discharges from lands owned or maintained by the City.	Utilities Engineering	Begin development in 2009; begin implementing SOPs by 02/15/2010.
PPOM-5	Establish annual inspection program for City-owned flow control and runoff treatment facilities and perform identified maintenance within prescribed Permit timelines.	Utilities Engineering	Begin development in 2009; begin implementing SOPs by 02/15/2010.
PPOM-6	Summarize annual activities for "Pollution Prevention and Operation and Maintenance" component of annual report; identify any updates to SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

CITY OF AUBURN 2009 STORMWATER MANAGEMENT PROGRAM

8. MONITORING

This section describes the Permit requirements related to water quality monitoring, including descriptions of the City's current and planned compliance activities for 2009.

8.1 Permit Requirements

The Permit (Section S8) does not require municipalities to conduct water quality sampling or other testing during this permit term, with the following exceptions:

- Sampling or testing required for characterizing illicit discharges pursuant to the SWMP's IDDE conditions.
- Water quality monitoring required for compliance with Total Maximum Daily Load (TMDL) conditions (water quality clean up plans). The current Permit does not require that Auburn perform TMDL-related monitoring because Ecology has not established TMDLs for water bodies that receive stormwater runoff from the City.
- Preparing future comprehensive, long-term water quality monitoring plan including two components: 1) stormwater monitoring and 2) targeted Stormwater Management Program effectiveness monitoring.
- By the 4th Annual Compliance Report (March 31, 2011), Auburn is required to identify two outfalls or conveyances where permanent stormwater sampling stations can be installed and operated for future monitoring. The City is also required to develop plans to monitor stormwater, sediment, and receiving water for physical, chemical, and/or biological characteristics. One outfall must represent high-density residential land use, and the other commercial land use.
- To monitor SWMP effectiveness, the City will need to identify two suitable Program questions and sites where targeted Program effectiveness monitoring can be conducted and develop a monitoring plan for these questions and sites. The proposed effectiveness monitoring is required to answer the following types of questions:
 - How effective is a specific targeted action or a narrow suite of actions?
 - Is the Stormwater Management Program achieving a targeted environmental outcome?

In addition, the City is required to provide the following monitoring and/or assessment data in each annual report:

- A description of any stormwater monitoring or studies conducted by the City during the reporting period. If stormwater monitoring was conducted on behalf of the City, or if studies or investigations conducted by other entities were reported to the City, a brief description of the type of information gathered or received shall be included in the annual report.
- An assessment of the appropriateness of the best management practices identified by the City for each component of the SWMP; and any changes made, or anticipated to be made, to the BMPs that were previously selected to implement the SWMP and why.

8.2 Current Compliance Activities

The City developed a map of the significant municipal stormwater outfalls, but has not yet developed a comprehensive water quality monitoring plan to implement future Permit water quality monitoring requirements.

8.3 Planned 2009 Compliance Activities

Auburn will likely need to create a Water Quality Monitoring Program to maintain compliance during the next Permit term. Except for summarizing monitoring activities no actions are required until 2010. Table 8-1 presents the work plan for 2009 SWMP monitoring activities.

Table 8-1. 2009 Water Quality Monitoring Work Plan			
Task ID	Task Description	Lead	Compliance Timeframe
MNTR -1	Participate in regional and state monitoring forums and future legislative actions in order to influence development of feasible and effective alternative future monitoring requirements.	Utilities Engineering	Continue participation.
MNTR -2	Summarize annual monitoring activities for the Annual Report; identify any updates to SWMP.	Utilities Engineering	The SWMP and Annual Compliance Report submittal is due on or before March 31st of each year.

APPENDIX A

Acronyms and Definitions from Permit

The following definitions and acronyms are taken directly from the Phase II Permit and are reproduced here for the reader's convenience.

AKART means all known, available, and reasonable methods of prevention, control and treatment. **All known, available and reasonable methods of prevention, control and treatment** refers to the State Water Pollution Control Act, Chapter 90.48.010 and 90.48.520 RCW.

Basin Plan is a surface water management process consisting of three parts: a scientific study of the basin's drainage features and their quality; developing actions and recommendations for resolving any deficiencies discovered during the study; and implementing the recommendations, followed by monitoring.

Best Management Practices ("BMPs") are the schedules of activities, prohibitions of practices, maintenance procedures, and structural and/or managerial practices approved by the Department that, when used singly or in combination, prevent or reduce the release of pollutants and other adverse impacts to waters of Washington State.

BMP means Best Management Practice.

CFR means Congressional Federal Register.

Component or Program Component means an element of the Stormwater Management Program listed in S5 Stormwater Management Program for Cities, Towns, and Counties or S6 Stormwater Management Program for Secondary Permittees of this permit.

CWA means Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Pub.L. 92-500, as amended Pub. L. 95-217, Pub. L. 95-576, Pub. L. (6-483 and Pub. L. 97-117, 33 U.S.C. 1251 et seq.

Discharge for the purpose of this permit means, unless indicated otherwise, any discharge from a MS4 owned or operated by the permittee.

Ecology's Western Washington Phase I Municipal Stormwater Permit regulates discharges from municipal separate storm sewers owned or operated by Clark, King, Pierce and Snohomish Counties, and the cities of Seattle and Tacoma.

Ecology's Western Washington Phase II Municipal Stormwater Permit covers certain "small" municipal separate stormwater sewer systems.

Entity means another governmental body, or public or private organization, such as another permittee, a conservation district, or volunteer organization.

Equivalent document means a technical stormwater management manual developed by a state agency, local government or other entity that includes the Minimum Technical Requirements in Appendix 1 of this Permit. The Department may conditionally approve manuals that do not include the Minimum Technical Requirements in Appendix 1; in general, the Best Management Practices included in those documents may be applied at new development and redevelopment sites, but the Minimum Technical Requirements in Appendix 1 must still be met.

Heavy equipment maintenance or storage yard means an uncovered area where any heavy equipment, such as mowing equipment, excavators, dump trucks, backhoes, or bulldozers are washed or maintained, or where at least five pieces of heavy equipment are stored.

Illicit connection means any man-made conveyance that is connected to a municipal separate storm sewer without a permit, excluding roof drains and other similar type connections. Examples include sanitary sewer

connections, floor drains, channels, pipelines, conduits, inlets, or outlets that are connected directly to the municipal separate storm sewer system.

Illicit discharge means any discharge to a municipal separate storm sewer that is not composed entirely of storm water except discharges pursuant to a NPDES permit (other than the NPDES permit for discharges from the municipal separate storm sewer) and discharges resulting from fire fighting activities.

IDDE means Illicit discharge detection and elimination.

Low Impact Development (LID) means a stormwater management and land development strategy applied at the parcel and subdivision scale that emphasizes conservation and use of on-site natural features integrated with engineered, small-scale hydrologic controls to more closely mimic pre-development hydrologic functions.

Major Municipal Separate Storm Sewer Outfall means a municipal separate storm sewer outfall from a single pipe with an inside diameter of 36 inches or more, or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a drainage area of more than 50 acres); or for municipal separate storm sewers that receive stormwater from lands zoned for industrial activity (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an inside diameter of 12 inches or more or from its equivalent (discharge from other than a circular pipe associated with a drainage area of 12 acres or more).

Material Storage Facilities means an uncovered area where bulk materials (liquid, solid, granular, etc.) are stored in piles, barrels, tanks, bins, crates, or other means.

Maximum Extent Practicable (MEP) refers to paragraph 402(p)(3)(B)(iii) of the federal Clean Water Act which reads as follows: Permits for discharges from municipal storm sewers shall require controls to reduce the discharge of pollutants to the maximum extent practicable, including management practices, control techniques, and system, design, and engineering methods, and other such provisions as the Administrator or the State determines appropriate for the control of such pollutants.

MEP means Maximum Extent Practicable.

MS4 – see **Municipal Separate Storm Sewer System**.

MTRs means Minimum Technical Requirements.

Municipal Separate Storm Sewer System (MS4) means a conveyance, or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, manmade channels, or storm drains):

- (i) owned or operated by a state, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to state law) having jurisdiction over disposal of wastes, storm water, or other wastes, including special districts under state law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to waters of the United States.
- (ii) designed or used for collecting or conveying stormwater.
- (iii) which is not a combined sewer; and (iv) which is not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.

National Pollutant Discharge Elimination System (NPDES) means the national program for issuing, modifying, revoking, and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under sections 307, 402, 318, and 405 of the Federal Clean Water Act, for the discharge of pollutants to surface waters of the state from point sources. These permits are referred to as NPDES permits and, in Washington State, are administered by the Washington Department of Ecology.

Notice of Intent (NOI) means the application for, or a request for coverage under this General Permit pursuant to WAC 173-226-200.

Outfall means point source as defined by 40 CFR 122.2 at the point where a municipal separate storm sewer discharges to waters of the State and does not include open conveyances connecting two municipal separate storm sewer systems, or pipes, tunnels, or other conveyances which connect segments of the same stream or other waters of the State and are used to convey waters of the State.

O&M means Operations and Maintenance.

Permittee unless otherwise noted, the term “Permittee” includes Permittee, Co-Permittee, and Secondary Permittee, as defined below:

- (i) A “Permittee” is a city, town, or county owning or operating a regulated small MS4 applying and receiving a permit as a single entity.
- (ii) A “Co-Permittee” is any operator of a regulated small MS4 that is applying jointly with another applicant for coverage under this Permit. Co-Permittees own or operate a regulated small MS4 located within or adjacent to another regulated small MS4.
- (iii) A “Secondary Permittee” is an operator of regulated small MS4 that is not a city, town, or county.

Small Municipal Separate Storm Sewer System or Small MS4 is a conveyance or system of conveyances for municipalities having populations of less than 100,000 according to the 1990 US census. Such systems include road drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, and/or storm drains that are:

- a. Owned or operated by a city, town, county, district, association or other public body created pursuant to State law having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under state law such as a sewer districts, flood control districts or drainage districts, or similar entity.
- b. Designed or used for collecting or conveying stormwater.
- c. Not a combined sewer system,
- d. Not part of a Publicly Owned Treatment Works (POTW) as defined at 40 CFR 122.2.
- e. Not defined as “large” or “medium” pursuant to 40 CFR 122.26(b)(4) & (7) or designated under 40 CFR 122.26 (a)(1)(v).

Small MS4s include systems similar to separate storm sewer systems in municipalities such as: universities, large publicly owned hospitals, prison complexes, highways and other thoroughfares. Storm sewer systems in very discrete areas such as individual buildings do not require coverage under this Permit.

Small MS4s do *not* include storm drain systems operated by non-governmental entities such as: individual buildings, private schools, private colleges, private universities, and industrial and commercial entities.

Stormwater means runoff during and following precipitation and snowmelt events, including surface runoff and drainage.

Stormwater Associated with Industrial and Construction Activity means the discharge from any conveyance which is used for collecting and conveying stormwater, which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant, or associated with clearing grading and/or excavation, and is required to have an NPDES permit in accordance with 40 CFR 122.26.

Stormwater Management Manual for Western Washington means the 5-volume technical manual (Publication Nos. 99-11 through 15 for the 2001 version and Publication Nos. 05-10-029-033 for the 2005 version (The 2005 version replaces the 2001 version) prepared by Ecology for use by local governments that contains BMPs to prevent, control, or treat pollution in storm water.

Stormwater Management Program (SWMP) means a set of actions and activities designed to reduce the discharge of pollutants from the regulated small MS4 to the maximum extent practicable and to protect water quality, and comprising the components listed in S5 or S6 of this Permit and any additional actions necessary to meet the requirements of applicable.

Total Maximum Daily Load (TMDL) is a calculation of the maximum amount of a pollutant that a waterbody can receive and still meet water quality standards,